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Supreme Court, U.S.  
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IN THE  
**Supreme Court of the United States**

HARRAH'S LAS VEGAS, INC., HARRAH'S LAUGHLIN, INC.,  
HARRAH'S OPERATING COMPANY, INC.,  
HARVEYS TAHOE MANAGEMENT COMPANY, INC.,  
and RIO PROPERTIES, INC.,

*Petitioners,*

v.

FRANK SNOWNEY,

*Respondent.*

ON PETITION FOR A WRIT OF CERTIORARI TO THE  
SUPREME COURT OF CALIFORNIA

**PETITION FOR A WRIT OF CERTIORARI**

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## **QUESTIONS PRESENTED FOR REVIEW**

1. Did the California Supreme Court err in concluding that the purposeful availment prong of the specific jurisdiction test for asserting personal jurisdiction over non-resident defendants is satisfied based on forum contacts involving an internet site and other contacts?

2. Did the California Supreme Court err by adhering to a "substantial connection" standard for assessing the relatedness prong of the specific jurisdiction test for asserting personal jurisdiction over non-resident defendants?

## **PARTIES TO THE PROCEEDING BELOW**

The parties to the proceeding below are:

**Frank Snowney** ("Snowney"), individually and on behalf of a class of persons similarly situated (plaintiff/respondent)

**Harrah's Las Vegas, Inc.** (defendant/petitioner)

**Harrah's Laughlin, Inc.** (defendant/petitioner)

**Harrah's Operating Company, Inc.** (defendant/petitioner)

**Harveys Tahoe Management Company, Inc.** (defendant/petitioner)

**Rio Properties, Inc.** (defendant/petitioner)

For ease of reference, the petitioners are identified collectively as the "Harrah's Hotel Defendants" in this petition.

## **CORPORATE DISCLOSURE STATEMENT**

Harrah's Las Vegas, Inc., Harrah's Laughlin, Inc., Harveys Tahoe Management Company, Inc., and Rio Properties, Inc. own and operate hotels and casinos in Nevada and are not publicly traded companies. They are direct or indirect subsidiaries of Harrah's Operating Company, Inc, which also is not a publicly traded company. Harrah's Operating Company, Inc. is wholly owned by Harrah's Entertainment, Inc., a publicly traded company.

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The Harrah's Hotel Defendants file this petition for writ of certiorari to review a decision of the California Supreme Court.

### **OPINIONS BELOW**

The trial court's order granting the Harrah's Hotel Defendants' motion to quash service for lack of personal jurisdiction is unpublished. The trial court's order was entered in Case No. BC267575; *Frank Snowney v. Harrah's Entertainment, Inc., et al*; in the Superior Court of the State of California for the County of Los Angeles. *See App. C.*

The court of appeal's opinion is published as *Snowney v. Harrah's Entertainment, Inc.*, 11 Cal. Rptr. 3d 35 (Cal. Ct. App. 2004). *See App. B.* The opinion of the California Supreme Court is published as *Snowney v. Harrah's Entertainment, Inc.*, 35 Cal.4th 1054 (2005). *See App. A.*

### **JURISDICTION**

The decision of the California Supreme Court sought to be reviewed was entered on June 6, 2005. No motion for rehearing was filed. This Court has jurisdiction under 28 U.S.C. § 1257(a).

### **STATUTORY AND CONSTITUTIONAL PROVISIONS INVOLVED**

The relevant provisions of the California long-arm statute, section 410.10 of the California Code of Civil Procedure, and of the Fourteenth Amendment are reproduced in the appendix to this petition. *See App. D, E.*